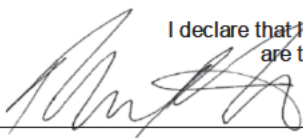


UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**CHARGE AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE	
Case 19-CA-299308	Date Filed 7/13/2022

**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT			
a. Name of Employer  Starbucks Corporation		b. Tel. No. (206) 318-2212	
		c. Cell No.	
		f. Fax No.	
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue, Suite 800 Seattle, WA 98134		e. Employer Representative  Howard Schultz, CEO	
		g. e-mail hschultz@starbucks.com	
		h. Number of workers employed approx. 500	
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop		j. Identify principal product or service Food and Beverage	
The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1), (3) and (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  Within the past six months the Employer closed and/or threatened to close at least 16 stores in order to discourage union activity, retaliate against workers engaged in union activity and/or escape its obligation to bargain with the Union. See Attachment A. At stores where the Union is certified the Employer announced the change without notice to the Union or an opportunity to bargain. The Union seeks immediate 10(j) relief.			
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Workers United			
4a. Address (Street and number, city, state, and ZIP code)  22 South 22 <sup>nd</sup> St Philadelphia, PA 19103		4b. Tel. No. (646) 448-6414	
		4c. Cell No.	
		4d. Fax No. (215) 575-9065	
		4e. e-mail rminter@pjbwu.org	
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Service Employees International Union			
<p>6. DECLARATION</p> <p>I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.</p>  <p>(signature of representative or person making charge)</p> <p>Marina Multhaup, Attorney</p> <p>(Print/type name and title or office, if any)</p> <p>Barnard Iglitzin &amp; Lavitt LLP 18 West Mercer St., Ste. 400 Address Seattle, WA 98119</p>		Tel. No. (206) 257-6001	
		Office, if any, Cell No.	
		Fax No. (206) 378-4132	
		e-mail multhaup@workerlaw.com	
Date 07/13/2022			

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

## **ATTACHMENT A**

The list of store closures alleged in this charge includes but is not limited to:

- Santa Monica & Westmount, West Hollywood, California
- Hollywood & Western, Los Angeles, California
- 1st & Los Angeles (Doubletree), Los Angeles, California
- Hollywood & Vine, Hollywood, California
- Ocean Front Walk & Moss, Santa Monica, California
- 2nd & San Pedro, Los Angeles, California
- 10th & Chestnut, Philadelphia, Pennsylvania
- 4th & Morrison, Portland, Oregon
- Gateway, Portland, Oregon
- 23rd & Jackson, Seattle, Washington
- Roosevelt Square, Seattle, Washington
- E. Olive Way, Seattle, Washington
- 505 Union Station, Seattle, Washington
- Westlake Center, Seattle, Washington
- Hwy 99 & Airport Rd, Everett, Washington
- Union Station Train Concourse, Washington, DC



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 19  
915 2nd Ave Ste 2948  
Seattle, WA 98174-1006

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (206)220-6300  
Fax: (206)220-6305



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July 13, 2022

Starbucks Corporation  
2401 Utah Ave S Ste 800  
Seattle, WA 98134

Re: Starbucks Corporation  
Case 19-CA-299308

Dear Sir or Madam:

Enclosed is a copy of a charge that has been filed in this case. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Attorney ELIZABETH H. DEVLEMING whose telephone number is (206) 220-6280. If this Board agent is not available, you may contact Deputy Regional Attorney MARTIN ESKENAZI whose telephone number is (206) 220-6289.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlrb.gov](http://www.nlrb.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** We seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations set forth in the charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Full and complete cooperation includes providing witnesses to give sworn affidavits to a Board agent, and providing all relevant documentary evidence requested by the Board agent. Sending us your written account of the facts and a statement of your position is not

enough to be considered full and complete cooperation. A refusal to fully cooperate during the investigation might cause a case to be litigated unnecessarily.

In addition, either you or your representative must complete the enclosed Commerce Questionnaire to enable us to determine whether the NLRB has jurisdiction over this dispute. If you recently submitted this information in another case, or if you need assistance completing the form, please contact the Board agent.

We will not honor requests to limit our use of position statements or evidence. Specifically, any material you submit may be introduced as evidence at a hearing before an administrative law judge regardless of claims of confidentiality. However, certain evidence produced at a hearing may be protected from public disclosure by demonstrated claims of confidentiality.

Further, the Freedom of Information Act may require that we disclose position statements or evidence in closed cases upon request, unless an exemption applies, such as those protecting confidential financial information or personal privacy interests.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Correspondence:** All documents submitted to the Region regarding your case MUST be filed through the Agency's website, [www.nlr.gov](http://www.nlr.gov). This includes all formal pleadings, briefs, as well as affidavits, documentary evidence, and position statements. The Agency requests all evidence submitted electronically to be in the form it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format).

If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge. If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

In addition, this Region will be issuing case-related correspondence and documents, including complaints, compliance specifications, dismissal letters, deferral letters, and withdrawal letters, electronically to the email address you provide. Please ensure that you receive important case-related correspondence, please ensure that the Board Agent assigned to your case has your preferred email address. These steps will ensure that you receive correspondence faster and at a significantly lower cost to the taxpayer. If there is some reason you are unable to receive correspondence via email, please contact the agent assigned to your case to discuss the circumstances that prevent you from using email.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlr.gov](http://www.nlr.gov) or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,



RONALD K. HOOKS  
Regional Director

Enclosures:

1. Copy of Charge
2. Commerce Questionnaire

cc: Alyson D. Dieckman, Attorney  
Littler Mendelson, P.C.  
600 University St., Ste. 3200  
Seattle, WA 98101-3122

Renea I. Saade, Attorney  
Littler Mendelson, P.C.  
500 L Street, Suite 201  
Anchorage, AK 99501-5909

Ryan P. Hammond, Attorney  
Littler Mendelson, P.C.  
600 University St., Ste. 3200  
Seattle, WA 98101-3122

lu



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 19  
915 2nd Ave Ste 2948  
Seattle, WA 98174-1006

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (206)220-6300  
Fax: (206)220-6305



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July 13, 2022

Richard A. Minter  
Workers United  
22 South 22nd Street  
Philadelphia, PA 16103

Re: Starbucks Corporation  
Case 19-CA-299308

Dear Mr. Minter:

The charge that you filed in this case on July 13, 2022 has been docketed as case number 19-CA-299308. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Attorney ELIZABETH H. DEVLEMING whose telephone number is (206) 220-6280. If this Board agent is not available, you may contact Deputy Regional Attorney MARTIN ESKENAZI whose telephone number is (206) 220-6289.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlr.gov](http://www.nlr.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. Because we seek to resolve labor disputes promptly, you should be ready to promptly present your affidavit(s) and other evidence. If you have not yet scheduled a date and time for the Board agent to take your affidavit, please contact the Board agent to schedule the affidavit(s). If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed without investigation.



**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Correspondence:** All documents submitted to the Region regarding your case MUST be filed through the Agency's website, [www.nlr.gov](http://www.nlr.gov). This includes all formal pleadings, briefs, as well as affidavits, documentary evidence, and position statements. The Agency requests all evidence submitted electronically to be in the form it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format).

If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge. If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

In addition, this Region will be issuing case-related correspondence and documents, including complaints, compliance specifications, dismissal letters, deferral letters, and withdrawal letters, electronically to the email address you provide. Please ensure that you receive important case-related correspondence, please ensure that the Board Agent assigned to your case has your preferred email address. These steps will ensure that you receive correspondence faster and at a significantly lower cost to the taxpayer. If there is some reason you are unable to receive correspondence via email, please contact the agent assigned to your case to discuss the circumstances that prevent you from using email.

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlr.gov](http://www.nlr.gov) or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,

A handwritten signature in black ink that reads "Ronald K. Hooks". The signature is written in a cursive, slightly slanted style.

RONALD K. HOOKS  
Regional Director

cc: Dimitri Iglitzin, Attorney  
Barnard, Iglitzin & Lavitt, LLP  
18 W Mercer St., Ste. 400  
Seattle, WA 98119-3971

Marina Multhaup, Attorney  
Barnard, Iglitzin & Lavitt, LLP  
18 W Mercer St., Ste. 400  
Seattle, WA 98119-3971

Michael White, Attorney  
Barnard, Iglitzin & Lavitt, LLP  
18 W Mercer St., Ste. 400  
Seattle, WA 98119-3971

lu



UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**AMENDED CHARGE AGAINST  
EMPLOYER**

DO NOT WRITE IN THIS SPACE	
Case <b>19-CA-299308</b>	Date Filed <b>7/28/2022</b>

**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

<b>1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT</b>	
a. Name of Employer  Starbucks Corporation	b. Tel. No. (206) 318-2212
	c. Cell No.
	f. Fax No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue, Suite 800 Seattle, WA 98134	e. Employer Representative  Howard Schultz, CEO
	g. e-mail hschultz@starbucks.com
	h. Number of workers employed approx. 500
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop	j. Identify principal product or service Food and Beverage
The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1), (3) and (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.	
<b>2. Basis of the Charge</b> (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  Within the past six months the Employer, from its headquarters in Seattle, WA, closed and/or threatened to close at least 16 stores nationwide in order to discourage union activity throughout the country, retaliate against workers engaged in union activity and/or escape its obligation to bargain with the Union. See Attachment A. At stores where the Union is certified the Employer announced the change without notice to the Union or an opportunity to bargain. The Union seeks immediate 10(j) relief.	
<b>3. Full name of party filing charge</b> (if labor organization, give full name, including local name and number) Workers United	
4a. Address (Street and number, city, state, and ZIP code)  22 South 22 <sup>nd</sup> St Philadelphia, PA 19103	4b. Tel. No. (646) 448-6414
	4c. Cell No.
	4d. Fax No. (215) 575-9065
	4e. e-mail rminter@pjbwu.org
<b>5. Full name of national or international labor organization of which it is an affiliate or constituent unit</b> (to be filled in when charge is filed by a labor organization) Service Employees International Union	
<b>6. DECLARATION</b> I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.   (signature of representative or person making charge)  Barnard Iglitzin & Lavitt LLP 18 West Mercer St., Ste. 400 Address Seattle, WA 98119	
Marina Multhaup, Attorney (Print/type name and title or office, if any)	
Tel. No. (206) 257-6001	
Office, if any, Cell No.	
Fax No. (206) 378-4132	
e-mail multhaup@workerlaw.com	
Date 07/28/2022	

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

## **ATTACHMENT A**

The list of store closures alleged in this charge includes but is not limited to:

- Santa Monica & Westmount, West Hollywood, California
- Hollywood & Western, Los Angeles, California
- 1st & Los Angeles (Doubletree), Los Angeles, California
- Hollywood & Vine, Hollywood, California
- Ocean Front Walk & Moss, Santa Monica, California
- 2nd & San Pedro, Los Angeles, California
- 10th & Chestnut, Philadelphia, Pennsylvania
- 4th & Morrison, Portland, Oregon
- Gateway, Portland, Oregon
- 23rd & Jackson, Seattle, Washington
- Roosevelt Square, Seattle, Washington
- E. Olive Way, Seattle, Washington
- 505 Union Station, Seattle, Washington
- Westlake Center, Seattle, Washington
- Hwy 99 & Airport Rd, Everett, Washington
- Union Station Train Concourse, Washington, DC



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 19  
915 2nd Ave Ste 2948  
Seattle, WA 98174-1006

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (206)220-6300  
Fax: (206)220-6305



Download  
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July 28, 2022

Starbucks Corporation  
2401 Utah Ave S Ste 800  
Seattle, WA 98134-1436

Re: Starbucks Corporation  
Case 19-CA-299308

Dear Sir or Madam:

Enclosed is a copy of the first amended charge that has been filed in this case.

**Investigator:** This charge is being investigated by Field Attorney ELIZABETH H. DEVLEMING whose telephone number is (206)220-6280. If the agent is not available, you may contact Deputy Regional Attorney MARTIN ESKENAZI whose telephone number is (206)220-6289.

**Presentation of Your Evidence:** As you know, we seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations in the first amended charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Procedures:** Pursuant to Section 102.5 of the Board's Rules and Regulations, parties must submit all documentary evidence, including statements of position, exhibits, sworn statements, and/or other evidence, by electronically submitting (E-Filing) them through the Agency's web site ([www.nlrb.gov](http://www.nlrb.gov)). You must e-file all documents electronically or provide a written statement explaining why electronic submission is not possible or feasible. Failure to comply with Section 102.5 will result in rejection of your submission. The Region will make its

determination on the merits solely based on the evidence properly submitted. All evidence submitted electronically should be in the form in which it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format). If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge.

If the Agency does not issue a formal complaint in this matter, parties will be notified of the Regional Director's decision by email. Please ensure that the agent handling your case has your current email address.

Very truly yours,

A handwritten signature in black ink that reads "Ronald K. Hooks". The signature is written in a cursive, flowing style.

RONALD K. HOOKS  
Regional Director

Enclosure: Copy of first amended charge

cc: Alyson D. Dieckman, Attorney  
Littler Mendelson, P.C.  
600 University St., Ste. 3200  
Seattle, WA 98101-3122

Ryan P. Hammond, Attorney  
Littler Mendelson, P.C.  
600 University St., Ste. 3200  
Seattle, WA 98101-3122

Renea I. Saade, Attorney  
Littler Mendelson, P.C.  
500 L Street, Suite 201  
Anchorage, AK 99501-5909



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 19  
915 2nd Ave Ste 2948  
Seattle, WA 98174-1006

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (206)220-6300  
Fax: (206)220-6305



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July 28, 2022

Richard A. Minter  
Workers United/SEIU  
22 S 22ND ST  
PHILADELPHIA, PA 16103

Re: Starbucks Corporation  
Case 19-CA-299308

Dear Mr. Minter:

We have docketed the first amended charge that you filed in this case.

**Investigator:** This charge is being investigated by Field Attorney ELIZABETH H. DEVLEMING whose telephone number is (206)220-6280. If the agent is not available, you may contact Deputy Regional Attorney MARTIN ESKENAZI whose telephone number is (206)220-6289.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. If you have additional evidence regarding the allegations in the first amended charge and you have not yet scheduled a date and time for the Board agent to obtain that evidence, please contact the Board agent to arrange to present that evidence. If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

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**Procedures:** Pursuant to Section 102.5 of the Board's Rules and Regulations, parties must submit all documentary evidence, including statements of position, exhibits, sworn statements, and/or other evidence, by electronically submitting (E-Filing) them through the Agency's web site ([www.nlrb.gov](http://www.nlrb.gov)). You must e-file all documents electronically or provide a

written statement explaining why electronic submission is not possible or feasible. Failure to comply with Section 102.5 will result in rejection of your submission. The Region will make its determination on the merits solely based on the evidence properly submitted. All evidence submitted electronically should be in the form in which it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format). If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge.

If the Agency does not issue a formal complaint in this matter, parties will be notified of the Regional Director's decision by email. Please ensure that the agent handling your case has your current email address.

Very truly yours,

A handwritten signature in black ink that reads "Ronald K. Hooks". The signature is written in a cursive, flowing style.

RONALD K. HOOKS  
Regional Director

cc: Dimitri Iglitzin, Attorney  
Barnard, Iglitzin & Lavitt, LLP  
18 W Mercer St., Ste. 400  
Seattle, WA 98119-3971

Marina Multhaup, Attorney  
Barnard, Iglitzin & Lavitt LLP  
18 W Mercer St Ste 400  
Seattle, WA 98119-3971

Michael White, Attorney  
Barnard, Iglitzin & Lavitt, LLP  
18 W Mercer St., Ste. 400  
Seattle, WA 98119-3971



UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS  
BOARD  
**SECOND AMENDED CHARGE  
AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE	
Case	Date Filed
19-CA-299308	8/30/2022

**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

**1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT**

a. Name of Employer  Starbucks Corporation		b. Tel. No. (206) 318-2212
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue, Suite 800 Seattle, WA 98134	e. Employer Representative  Howard Schultz, CEO	g. e-mail hschultz@starbucks.com
		h. Number of workers employed approx. 500
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop	j. Identify principal product or service Food and Beverage	
The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1), (3) and (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.		

**2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)**

Within the past six months the Employer, from its headquarters in Seattle, WA, closed and/or threatened to close at least 16 stores nationwide in order to discourage union activity throughout the country, retaliate against workers engaged in union activity and/or escape its obligation to bargain with the Union. See Attachment A. At stores where the Union is certified the Employer announced the change without notice to the Union or an opportunity to bargain. The Union seeks immediate 10(j) relief.

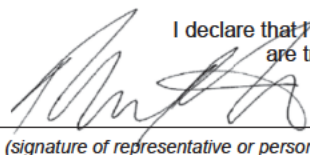
**3. Full name of party filing charge (if labor organization, give full name, including local name and number)**

Workers United

4a. Address (Street and number, city, state, and ZIP code)  22 South 22 <sup>nd</sup> St Philadelphia, PA 19103	4b. Tel. No. (646) 448-6414
	4c. Cell No.
	4d. Fax No. (215) 575-9065
	4e. e-mail rminter@pjbwu.org

**5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)**

Service Employees International Union

**6. DECLARATION**I declare that I have read the above charge and that the statements  
are true to the best of my knowledge and belief.

(signature of representative or person making charge)

Marina Multhaup, Attorney

(Print/type name and title or office, if any)

Barnard Iglitzin & Lavitt LLP  
18 West Mercer St., Ste. 400

Address Seattle, WA 98119

Date 08/30/2022

Tel. No. (206) 257-6001
Office, if any, Cell No.
Fax No. (206) 378-4132
e-mail multhaup@workerlaw.com

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.



## **ATTACHMENT A**

The list of store closures alleged in this charge includes but is not limited to:

- Santa Monica & Westmount, West Hollywood, California
- Hollywood & Western, Los Angeles, California
- 1st & Los Angeles (Doubletree), Los Angeles, California
- Hollywood & Vine, Hollywood, California
- Ocean Front Walk & Moss, Santa Monica, California
- 2nd & San Pedro, Los Angeles, California
- 10th & Chestnut, Philadelphia, Pennsylvania
- 4th & Morrison, Portland, Oregon
- Gateway, Portland, Oregon
- 23rd & Jackson, Seattle, Washington
- Roosevelt Square, Seattle, Washington
- E. Olive Way, Seattle, Washington
- 505 Union Station, Seattle, Washington
- Westlake Center, Seattle, Washington
- Hwy 99 & Airport Rd, Everett, Washington
- Union Station Train Concourse, Washington, DC
- Holman Road Store, Seattle, Washington
- Plaza Store, Kansas City, Missouri



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 19  
915 2nd Ave Ste 2948  
Seattle, WA 98174-1006

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (206)220-6300  
Fax: (206)220-6305



Download  
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Mobile App

August 30, 2022

Starbucks Corporation  
2401 Utah Ave S Ste 800  
Seattle, WA 98134-1436

Re: Starbucks Corporation  
Case 19-CA-299308

Dear Sir or Madam:

Enclosed is a copy of the second amended charge that has been filed in this case.

**Investigator:** This charge is being investigated by Field Attorney ELIZABETH H. DEVLEMING whose telephone number is (206)220-6280. If the agent is not available, you may contact Deputy Regional Attorney MARTIN ESKENAZI whose telephone number is (206)220-6289.

**Presentation of Your Evidence:** As you know, we seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations in the second amended charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Procedures:** Pursuant to Section 102.5 of the Board's Rules and Regulations, parties must submit all documentary evidence, including statements of position, exhibits, sworn statements, and/or other evidence, by electronically submitting (E-Filing) them through the Agency's web site ([www.nlrb.gov](http://www.nlrb.gov)). You must e-file all documents electronically or provide a written statement explaining why electronic submission is not possible or feasible. Failure to comply with Section 102.5 will result in rejection of your submission. The Region will make its

determination on the merits solely based on the evidence properly submitted. All evidence submitted electronically should be in the form in which it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format). If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge.

If the Agency does not issue a formal complaint in this matter, parties will be notified of the Regional Director's decision by email. Please ensure that the agent handling your case has your current email address.

Very truly yours,

A handwritten signature in black ink that reads "Ronald K. Hooks". The signature is written in a cursive, flowing style.

RONALD K. HOOKS  
Regional Director

Enclosure: Copy of second amended charge

cc: Alyson D. Dieckman, Attorney  
Littler Mendelson, P.C.  
600 University St., Ste. 3200  
Seattle, WA 98101-3122

Ryan P. Hammond, Attorney  
Littler Mendelson, P.C.  
600 University St Ste 3200  
Seattle, WA 98101-3122

Renea I. Saade, Attorney  
Littler Mendelson, P.C.  
500 L Street, Suite 201  
Anchorage, AK 99501-5909



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 19  
915 2nd Ave Ste 2948  
Seattle, WA 98174-1006

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (206)220-6300  
Fax: (206)220-6305



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Mobile App

August 30, 2022

Richard A. Minter, Assistant Manager  
Workers United  
22 South 22nd Street  
Philadelphia, PA 19103

Re: Starbucks Corporation  
Case 19-CA-299308

Dear Mr. Minter:

We have docketed the second amended charge that you filed in this case.

**Investigator:** This charge is being investigated by Field Attorney ELIZABETH H. DEVLEMING whose telephone number is (206)220-6280. If the agent is not available, you may contact Deputy Regional Attorney MARTIN ESKENAZI whose telephone number is (206)220-6289.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. If you have additional evidence regarding the allegations in the second amended charge and you have not yet scheduled a date and time for the Board agent to obtain that evidence, please contact the Board agent to arrange to present that evidence. If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Procedures:** Pursuant to Section 102.5 of the Board's Rules and Regulations, parties must submit all documentary evidence, including statements of position, exhibits, sworn statements, and/or other evidence, by electronically submitting (E-Filing) them through the Agency's web site ([www.nlrb.gov](http://www.nlrb.gov)). You must e-file all documents electronically or provide a

written statement explaining why electronic submission is not possible or feasible. Failure to comply with Section 102.5 will result in rejection of your submission. The Region will make its determination on the merits solely based on the evidence properly submitted. All evidence submitted electronically should be in the form in which it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format). If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge.

If the Agency does not issue a formal complaint in this matter, parties will be notified of the Regional Director's decision by email. Please ensure that the agent handling your case has your current email address.

Very truly yours,

A handwritten signature in black ink that reads "Ronald K. Hooks". The signature is written in a cursive, flowing style.

RONALD K. HOOKS  
Regional Director

cc: Dimitri Iglitzin, Attorney  
Barnard, Iglitzin & Lavitt, LLP  
18 W Mercer St., Ste. 400  
Seattle, WA 98119-3971

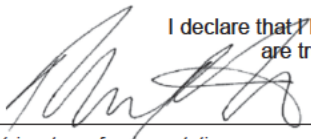
Marina Multhaup, Attorney  
Barnard, Iglitzin & Lavitt LLP  
18 W Mercer St., Ste. 400  
Seattle, WA 98119-3971

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**THIRD AMENDED CHARGE  
AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE	
Case 19-CA-299308	Date Filed 10/12/2022

**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer  Starbucks Corporation	b. Tel. No. (206) 318-2212
	c. Cell No.
	f. Fax No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue, Suite 800 Seattle, WA 98134	e. Employer Representative  Howard Schultz, CEO
	g. e-mail hschultz@starbucks.com
	h. Number of workers employed approx. 500
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop	j. Identify principal product or service Food and Beverage
The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1), (3) and (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.	
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)  Within the past six months the Employer, from its headquarters in Seattle, WA, closed and/or threatened to close at least 16 stores nationwide in order to discourage union activity throughout the country, retaliate against workers engaged in union activity and/or escape its obligation to bargain with the Union. See Attachment A. At stores where the Union is certified the Employer announced the change without notice to the Union or an opportunity to bargain. The Union seeks immediate 10(j) relief.	
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Workers United	
4a. Address (Street and number, city, state, and ZIP code)  22 South 22 <sup>nd</sup> St Philadelphia, PA 19103	4b. Tel. No. (646) 448-6414
	4c. Cell No.
	4d. Fax No. (215) 575-9065
	4e. e-mail rminter@pjbwu.org
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Service Employees International Union	
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.	
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;">             (signature of representative or person making charge)             Barnard Iglitzin &amp; Lavitt LLP            18 West Mercer St., Ste. 400            Address Seattle, WA 98119         </div> <div style="width: 45%;">           Marina Multhaup, Attorney            (Print/type name and title or office, if any)              Date 10/12/2022         </div> </div>	
Tel. No. (206) 257-6001	
Office, if any, Cell No.	
Fax No. (206) 378-4132	
e-mail multhaup@workerlaw.com	

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

## **ATTACHMENT A**

The list of store closures alleged in this charge includes but is not limited to:

- Santa Monica & Westmount, West Hollywood, California
- Hollywood & Western, Los Angeles, California
- 1st & Los Angeles (Doubletree), Los Angeles, California
- Hollywood & Vine, Hollywood, California
- Ocean Front Walk & Moss, Santa Monica, California
- 2nd & San Pedro, Los Angeles, California
- 10th & Chestnut, Philadelphia, Pennsylvania
- 4th & Morrison, Portland, Oregon
- Gateway, Portland, Oregon
- 23rd & Jackson, Seattle, Washington
- Roosevelt Square, Seattle, Washington
- E. Olive Way, Seattle, Washington
- 505 Union Station, Seattle, Washington
- Westlake Center, Seattle, Washington
- Hwy 99 & Airport Rd, Everett, Washington
- Union Station Train Concourse, Washington, DC
- Holman Road Store, Seattle, Washington
- Plaza Store, Kansas City, Missouri
- Nevada & Brookside Store, 1455 S Nevada Ave, Colorado Springs, CO 80905
- Bryn Mawr Store, 1070 Bryn Mawr Ave, Chicago, IL 60660
- Kearney Plaza Store, 1102 NW Lovejoy St, Portland, OR 97209





UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 19  
915 2nd Ave Ste 2948  
Seattle, WA 98174-1006

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (206)220-6300  
Fax: (206)220-6305



Download  
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Mobile App

October 13, 2022

Starbucks Corporation  
2401 Utah Ave S Ste 800  
Seattle, WA 98134-1436

Re: Starbucks Corporation  
Case 19-CA-299308

Dear Sir or Madam:

Enclosed is a copy of the third amended charge that has been filed in this case.

**Investigator:** This charge is being investigated by Field Attorney ELIZABETH H. DEVLEMING whose telephone number is (206)220-6280. If the agent is not available, you may contact Deputy Regional Attorney MARTIN ESKENAZI whose telephone number is (206)220-6289.

**Presentation of Your Evidence:** As you know, we seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations in the third amended charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

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comply with Section 102.5 will result in rejection of your submission. The Region will make its determination on the merits solely based on the evidence properly submitted. All evidence submitted electronically should be in the form in which it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format). If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge.

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Very truly yours,

A handwritten signature in black ink that reads "Ronald K. Hooks". The signature is written in a cursive, flowing style.

RONALD K. HOOKS  
Regional Director

Enclosure: Copy of third amended charge

cc: Alyson D. Dieckman, Attorney  
Littler Mendelson, P.C.  
600 University St., Ste. 3200  
Seattle, WA 98101-3122

Ryan P. Hammond, Attorney  
Littler Mendelson, P.C.  
600 University St Ste 3200  
Seattle, WA 98101-3122

Renea I. Saade, Attorney  
Littler Mendelson, P.C.  
500 L Street, Suite 201  
Anchorage, AK 99501-5909



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

REGION 19  
915 2nd Ave Ste 2948  
Seattle, WA 98174-1006

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (206)220-6300  
Fax: (206)220-6305



Download  
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Mobile App

October 13, 2022

Richard A. Minter, Assistant Manager  
Workers United  
22 S 22nd St  
Philadelphia, PA 19103

Re: Starbucks Corporation  
Case 19-CA-299308

Dear Mr. Minter:

We have docketed the third amended charge that you filed in this case.

**Investigator:** This charge is being investigated by Field Attorney ELIZABETH H. DEVLEMING whose telephone number is (206)220-6280. If the agent is not available, you may contact Deputy Regional Attorney MARTIN ESKENAZI whose telephone number is (206)220-6289.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. If you have additional evidence regarding the allegations in the third amended charge and you have not yet scheduled a date and time for the Board agent to obtain that evidence, please contact the Board agent to arrange to present that evidence. If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed.

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Very truly yours,

A handwritten signature in black ink that reads "Ronald K. Hooks". The signature is written in a cursive, flowing style.

RONALD K. HOOKS  
Regional Director

cc: Dimitri Iglitzin, Attorney  
Barnard, Iglitzin & Lavitt, LLP  
18 W Mercer St., Ste. 400  
Seattle, WA 98119-3971

Marina Multhaup, Attorney  
Barnard, Iglitzin & Lavitt LLP  
18 W Mercer St., Ste. 400  
Seattle, WA 98119-3971